

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

In re APPLICATION OF NOKIA
CORPORATION FOR AN ORDER OF
DISCOVERY PURSUANT TO 28 U.S.C. §
1782

Case No. 1:07-mc-47
Honorable Gordon J. Quist

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CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICH.

BY M/S

**NOKIA CORPORATION'S MOTION TO COMPEL ROBERT BOSCH GMBH TO
COMPLY WITH COURT ORDER TO PRODUCE CERTAIN LICENSES**

EXPEDITED CONSIDERATION REQUESTED

Pursuant to 28 U.S.C. § 1782 and Federal Rule of Civil Procedure 37, Nokia Corporation ("Nokia") respectfully moves the Court to compel Robert Bosch GmbH ("Bosch") to produce its licenses to the Bosch mobile telephony patent portfolio, which this Court ordered Bosch to produce on April 23, 2007.

Nokia also requests expedited briefing and consideration of the present motion. Specifically, Nokia requests that the Court order Bosch to respond to the present motion no later than seven days after service. Nokia requests expedited consideration because Nokia seeks to use the information sought in a proceeding between Bosch and Nokia in a German court. The proceeding begins July 3, 2007, but briefs will be submitted in advance of the proceeding.


Nokia attempted to obtain concurrence with its motion in a telephone conference with counsel for Robert Bosch GmbH on May 21, 2007. Counsel for Bosch refused to concur with Nokia's motion.

WHEREFORE, Nokia Corporation respectfully requests that this Court compel Robert Bosch GmbH to produce its licenses to the Bosch mobile telephony patent portfolio in compliance with the Court's April 23, 2007, Order.

Respectfully submitted,

VARNUM, RIDDERING, SCHMIDT & HOWLETT LLP
Attorneys for Applicant

Date: May 21, 2007

By: _____

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